

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

KEITH HOBBS, individually and on  
behalf of others similarly situated,

Plaintiff,

v.

APOLLO INTERACTIVE, INC.

Defendant.

Case No. 4:19-cv-00057-CDL

JURY TRIAL DEMANDED

**DEFENDANT’S MOTION FOR LEAVE TO FILE COUNTERCLAIMS**

Defendant Apollo Interactive, pursuant to Rule 13 and 15(a) of the Federal Rules of Civil Procedure, moves the Court for leave to file counterclaims against Plaintiff. The reasons in support of Defendant’s Motion are set forth fully in their Memorandum of Law filed contemporaneously herewith.

WHEREFORE, Defendant respectfully requests that this Motion be granted and that the Court grants it leave to file its counterclaims against Plaintiff.

Dated September 30, 2019.

Respectfully Submitted,

/s/ Michael P. Bruyere

Michael P. Bruyere

Ga. Bar No. 090101

Matthew N. Foree

Ga. Bar No. 268702

FREEMAN MATHIS & GARY, LLP  
100 Galleria Parkway, Suite 1600  
Atlanta, GA 30339  
Telephone: (770) 818-1435  
[mbruyere@fmglaw.com](mailto:mbruyere@fmglaw.com)  
[mforee@fmglaw.com](mailto:mforee@fmglaw.com)

Derek A. Newman,  
*Pro Hac Vice*  
Keith Scully  
*Pro Hac Vice*  
NEWMAN DU WORS LLP  
2101 Fourth Avenue, Suite 1500  
Seattle, WA 98121  
206.274.2800 - Phone  
206.274.2801 - Fax  
[dn@nemanlaw.com](mailto:dn@nemanlaw.com)  
[keith@newmanlaw.com](mailto:keith@newmanlaw.com)

*Counsel for Defendant Apollo  
Interactive, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the within and foregoing **DEFENDANT'S MOTION FOR LEAVE TO FILE COUNTERCLAIMS** with the Clerk of Court using the CM/ECF system, which will automatically send electronic mail notification of such filing to the following counsel of record:

Anthony L. Paronich, Esq.  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043

James M. Feagle  
Cliff R. Dorsen  
Skaar & Feagle, LLP  
2374 Main Street, Suite B  
Tucker, GA 30084

Kris Skaar  
Justin T. Holcombe  
Skaar & Feagle, LLP  
133 Mirramont Lake Drive  
Woodstock, GA 30189

Submitted this 30th day of September, 2019.

/s/Michael P. Bruyere

Michael P. Bruyere  
Ga. Bar No. 090101

*Counsel for Defendant Apollo  
Interactive, Inc.*

FREEMAN MATHIS & GARY, LLP  
100 Galleria Parkway, Suite 1600  
Atlanta, GA 30339  
(770) 818-1435 (telephone)  
(770) 937-9960 (facsimile)  
Doc#15977846